

# WIGDOR LLP

ATTORNEYS AND COUNSELORS AT LAW

85 FIFTH AVENUE  
NEW YORK, NY 10003  
TEL 212.257.6800  
FAX 212.257.6845  
WWW.WIGDORLAW.COM

**Michael J. Willemín**  
[mwillemín@wigdorlaw.com](mailto:mwillemín@wigdorlaw.com)

February 15, 2021

## **VIA ECF**

The Honorable Loretta A. Preska  
United States District Court  
Southern District of New York  
500 Pearl St., Courtroom 12A  
New York, NY 10007

Re: Hillel v. Obvio Health USA, Inc., et al.; Case No. 1:20-cv-04647(LAP)(DCF)

Dear Judge Preska:

We represent Plaintiff Iris Hillel and write jointly with all Defendants (together, “Parties”) to propose a schedule for proceeding with discovery upon request of the Court. See Dkt. 61.

1. Initial disclosures pursuant to Fed. R. Civ. P. 26(a)(1) shall be completed no later than March 1, 2021.
2. All fact discovery is to be completed no later than October 15, 2021.
3. Initial requests for the production of documents shall be served by March 15, 2021.
4. Initial Interrogatories shall be served by March 15, 2021.
5. Depositions shall be completed by September 15, 2021.
6. Requests to admit shall be served by September 15, 2021.
7. All expert discovery, including disclosure of expert reports, production of underlying documents, and depositions shall be completed by November 19, 2021.
8. Deadline to add or join parties or claims shall be March 31, 2021.

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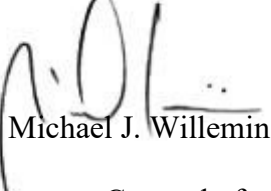
The Honorable Loretta Preska

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We thank the Court for Your Honor's time and consideration of this matter.

Respectfully submitted,



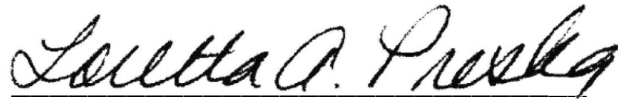
Michael J. Willemijn

cc: Counsel of record *via* ECF

The discovery plan proposed above is approved. The parties shall appear for a status conference on May 19, 2021 at 9:00 a.m.

**SO ORDERED.**

Dated: February 16, 2021  
New York, New York



LORETTA A. PRESKA, U.S.D.J.